

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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CLEMENT DOOKHAN, Individually	:	
and on Behalf of All Other Persons Similarly	:	ECF
Situated,	:	
	:	14 Civ. 4587 (ENV)(JO)
Plaintiff,	:	
	:	
-against-	:	
	:	
BROOKDALE FAMILY CARE CENTERS,	:	
INC., JOYCE WYNTERS, TRINA CORNET,	:	
SUSAN PENNACHIO	:	
	:	
Defendants.	:	
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**STIPULATION EXTENDING DEFENDANTS BROOKDALE FAMILY
CARE CENTERS, INC., JOYCE WYNERS AND SUSAN PENNACHIO'S
TIME TO RESPOND TO THE COMPLAINT**

IT IS HEREBY STIPULATED, CONSENTED TO AND AGREED by and
between the Parties through their undersigned counsel as follows:

- 1) Plaintiff shall file an Amended Complaint on or before Friday, September 5, 2014;
- 2) Defendants Brookdale Family Care Centers, Inc. Joyce Wynters and Susan Pennachio shall file an Answer or other response to the operative Complaint on or before October 3, 2014;
- 3) The Defendants listed in Paragraph 2 waive any defense based on service of process, and reserve all other defenses; and
- 4) No previous requests for extension of the current putative deadline to respond to the Complaint have been made.

LAW OFFICE OF WILLIAM COUDERT RAND
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INC., JOYCE WYNTERS AND SUSAN
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By: William Coudert Rand w/permission
WILLIAM COUDERT RAND, ESQ.

By: Paul J. Siegel
PAUL J. SIEGEL, ESQ.

Dated: 9/3/14

Dated: 9/3/14

SO ORDERED on this ____ day of _____, 2014

United States District Judge